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September 11, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Standard Operating Procedure FO.10, DCN 92.04, Decrease in Weekly Inspections of Gray Drums

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document change notice (DCN) submitted by DOE and prime operating contractor, EG&G. Based upon the brevity of the DCN, we are unable to tell how the decrease in weekly inspections of the gray drums will be implemented and which gray drums are affected. To be compliant with RCRA and consistent with previous staff-level communication, the following should be considered:


1) Any gray drum that is filled with material from an IHSS or PAC will be placed in a RCRA-compliant 90 day storage area pending characterization. These drums should continue to be inspected on a weekly basis (6 CCR 1007-3, Section 265.174).

2) Gray drums that are filled outside an IHSS or PAC will be left at the drilling location pending characterization. Since these drums are assumed to be non-hazardous material, weekly inspections are not required.

3) Gray drums that are empty or that are filled with material that has been characterized as non-hazardous do not require inspection.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,


Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Martin Hestmark, EPA
Mike Arndt, EG&G
Marcella Broussard, EG&G
Jackie Berardini, CDH-OE

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